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UNDER SEAL

SEALED MOTION TO SEAL

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully requests leave to file under seal the accompanying Motion for Order to Facilitate Attendance of Foreign Witnesses. As grounds therefor, defendant states that his intention to call foreign witnesses is a sensitive issue, public discussion of which would interfere with the ability of the defense to work safely and effectively in the foreign countries in which the witnesses reside.

Respectfully submitted,

DZHOKHAR TSARNAEV
by his attorneys

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Certificate of Service

I hereby certify that this document is being served upon counsel for the United States by hand delivery and e-mail PDF on March 10, 2015.

A handwritten signature in blue ink, appearing to read "Miriam Conrad", is placed over a horizontal line.